



September 12, 2024

Via ECF

The Honorable Margaret M. Garnett
United States District Judge
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007

Re: *Martin v. Brighthouse Life Insurance Company* - Case 1:21-cv-02923; Request for Provisional Sealing of Plaintiff's Motion for Class Certification and Accompanying Exhibits

Dear Judge Garnett:

We represent Plaintiffs in the above-referenced action. We submit this letter to respectfully request an order granting provisional sealing of Plaintiff's forthcoming Motion for Class Certification ("Motion") and accompanying exhibits.

The basis for this request is that the Motion and exhibits may contain sensitive personal and proprietary commercial information of Defendant Brighthouse. In particular, certain documents may reveal personal financial information, or confidential business strategies and internal communications.

We respectfully request that the Court issue a provisional sealing order until the parties can meet and confer and determine which information contained in the Motion and accompanying exhibits, if any, Defendants request to be redacted. Following the meet and confer with Defendants, Plaintiffs will re-file a redacted Motion and corresponding exhibits.

For the foregoing reasons, Plaintiffs respectfully submit that the Motion and accompanying exhibits be provisionally sealed.

We appreciate the Court's consideration of this request.

Respectfully submitted,

/s/Mitchell Breit

Mitchell Breit

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Hon. Margaret M. Garnett
September 12, 2024

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cc: All Counsel of Record (via ECF)

Application GRANTED. It is hereby ORDERED that Plaintiff's Motion for Class Certification and accompanying exhibits shall be provisionally sealed. It is further ORDERED that the parties shall promptly meet and confer to determine which information contained in the Motion for Class Certification and accompanying exhibits should be redacted. It is further ORDERED that Plaintiff shall refile a redacted Motion for Class Certification and accompanying exhibits in accordance with the Court's Individual Rules no later than **September 26, 2024**, along with a letter to the Court explaining the basis for the agreed-upon redactions, if any.

The Clerk of Court is respectfully directed to terminate Dkt. No. 118.

SO ORDERED. Dated September 16, 2024.



HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE